

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

AIMS INSTITUTE, PLLC, *et al.*,

Plaintiffs,

v.

MERRICK GARLAND, *et al.*,

Defendants.

Civil Action No. 4:22-CV-02396

JOINT STATUS REPORT

In accordance with the Court's December 15, 2022 Order to Report, Plaintiffs AIMS Institute, PLLC et al. and Defendants, Attorney General Merrick Garland, et al., hereby state as follows:

1. The Court authorized Plaintiffs to take a 30(b)(6) deposition of Defendants in this case. Plaintiffs took the deposition on January 5, 2023.
2. No further discovery is needed in this matter. The Parties intend to propose a revised summary judgment briefing schedule for the Court by next Friday, January 13, 2023.
3. Plaintiffs state that they anticipate requesting leave to amend to add claims relating to other DOJ/DEA violations of the Freedom of Information Act uncovered during the 30(b)(6) deposition. The proposed additional claims require no additional discovery and can be decided as a matter of law on the current record.

The Parties therefore request that the Court set a January 13, 2023 deadline to submit a revised briefing schedule to the Court.

DATED: January 6, 2023

Respectfully Submitted,

s/Jimmy A. Rodriguez
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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I certify that on January 6, 2023, a true and correct copy of the foregoing was filed with the United States District Clerk for the Southern District of Texas and electronically served on all counsel of record via the District's ECF system.

s/ Jimmy A. Rodriguez
Jimmy A. Rodriguez
Assistant United States Attorney